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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: ALTA MESA §
RESOURCES, INC. § CASE NO. 4:19-cv-00957
SECURITIES LITIGATION §

ORAL AND VIDEOTAPED DEPOSITION OF MILES PALKE 30(b)(6)
JUNE 13, 2023

ORAL AND VIDEOTAPED DEPOSITION OF MILES PALKE
30(B)(6), produced as a witness at the instance of the
Plaintiffs and duly sworn, was taken in the above styled
and numbered cause on Tuesday, June 13, 2023, from
9:39 a.m. to 4:06 p.m., before Janalyn Elkins, CSR, in
and for the State of Texas, reported by computerized
stenotype machine, viz Zoom, pursuant to the Federal
Rules of Civil Procedure and any provisions stated on
the record herein.

[PAGES INTENTIONALLY OMITTED]

1 MR. BRODEUR: Mariana, could I have tab 39,
2 please?

3 (Exhibit No. CP-0632 was marked.)

4 Q. (BY MR. BRODEUR) The first file in your
5 Marked Exhibits folder should now be filed Exhibit 3 --
6 excuse me, Exhibit 0632.

7 A. Yes, I see that.

8 Q. If you could open that up.

9 A. I have it open.

10 Q. Did you review this email chain or any part of
11 this email chain when you were preparing for your
12 deposition today?

13 A. Yes, I have seen this chain.

14 Q. Did you end up speaking with Mark Zajac around
15 this time?

16 A. I believe we had a conver -- well, I'll say
17 Ms. Okafor and I had a conversation with someone from
18 KPMG on the 7th of May 2019 and I would infer from this
19 that it was Mr. Zajac.

20 Q. Okay. Do you have any recollection of that
21 conversation?

22 A. Very little.

23 Q. Okay. Do you remember about how long was that
24 conversation?

25 A. In my recollection it may have been ten minutes

1 long.

2 Q. Did you speak with Mr. Turner on the phone
3 between the time he sent this email that is at the top
4 of Exhibit 632?

5 A. It's not impossible, but I don't recollect
6 speaking to Mr. Turner on the phone that day until maybe
7 later that day to discuss the 10-K that we were kicking
8 around at the time.

9 Q. Okay. What did you discuss with Mr. Zajac?

10 A. So what I recollect discussing with Mr. Zajac
11 was him asking us questions about how -- you know, about
12 probable well counts and numbers of wells and, you know,
13 these were things that we had not done any prior work on
14 for probable wells or possible wells. And that's -- I
15 think the basis of the conversation was we said, well,
16 we don't know what you're going to get with 12 wells per
17 section because -- or eight wells per section -- and
18 those numbers are off the hip. I don't remember the
19 specifics. But we hadn't done any technical work on it,
20 so we didn't have much to say.

21 Q. Did you discuss the reasonableness of the -- of
22 the assumption of four wells per section and the earlier
23 estimate of 250,000 barrels of oil per well?

24 A. We -- we -- I -- we may have discussed that. I
25 don't recollect it clearly.

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